

Sullivan & Worcester LLP 1633 Broadway New York, NY 10019 T 212 660 3000 F 212 660 3001 www.sandw.com

January 4, 2016

VIA ECF

Honorable P. Kevin Castel United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Acosta, 15 Cr. 592

Dear Judge Castel:

We represent Esmeraldo Acosta in the above-referenced matter.

A conference is scheduled before Your Honor for tomorrow, Tuesday, January 5, 2016 at 2:00 p.m. We respectfully request that the Court adjourn the conference for approximately 30 days.

On December 31, 2015, the government provided me with a draft plea agreement, which I am reviewing, have had translated into Spanish for Mr. Acosta and am planning to discuss with Mr. Acosta. Additional time is required to allow for us to meet with Mr. Acosta and for Mr. Acosta to consider the government's proposal.

Counsel for Mr. Acosta's co-defendant and the government do not object to the requested adjournment. Both defense counsel consent to the exclusion of time through the next conference date.

Respectfully submitted,

Harry H. Rim

cc: Drew Johnson-Skinner, Esq. (Via ECF) Donald Yanella, Esq. (Via ECF)